INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: August 24, 2007

RE: Barber and Ross Company / F149-23029-00011

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 03/23/06

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100 North Senate Avenue
MC 61 - 53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

Barber and Ross Company
1001 W. Culver Road
Knox, Indiana 46534

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F149-23029-00011	
Issued by: *Original signed by Nisha Sizemore* Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: August 24, 2007 Expiration Date: August 24, 2012

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary wood windows manufacturing and surface coating operation.

Source Address:	1001 W. Culver Road, Knox, Indiana 46534
Mailing Address:	1001 W. Culver Road, Knox, Indiana 46534
General Source Phone Number:	(219) 772-2955
SIC Code:	2431, 2499
County Location:	Starke
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) wood preservative dip tank, constructed in 1995, with a maximum throughput of 1600 units per hour, using baffles and dry filters for control;

(b) One (1) primer spray line, constructed in 1995, with a maximum throughput of 1600 units per hour, using baffles and dry filters for control;

(c) One (1) stain/clearcoat spray line, constructed in 1995, with a maximum throughput of 1600 units per hour, using baffles and dry filters for control;

(d) Sealants, sealers, caulks, and adhesives also during the manufacturing process;

(e) One (1) woodworking operation, constructed in 1995, with a processing weight rate of 1,317 pounds per hour, controlled by a baghouse and exhausting to Stack D.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

(a) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4]

(b) Natural gas-fired combustion sources with heat input equal to or less than ten million Btu/hr:

(1) One (1) natural gas-fired aerator heater, identified as H-7, with a maximum heat input capacity of 1.2 MMBtu/hr; [326 IAC 6-2-4]

(2) Four (4) natural gas-fired roof mounted heaters, identified as H-1 through H-4, with a maximum heat input capacity of 0.150 MMBtu/hr; [326 IAC 6-2-4]

(3) Two (2) natural gas-fired aerator heaters, identified as H-5 and H-6, each with a maximum heat input capacity of 3.0 MMBtu/hr; [326 IAC 6-2-4]

(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three-hundredths (0.03) grain per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute; [326 IAC 6-3-2]

(d) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months; [326 IAC 8-3-2] [326 IAC 8-3-5]

(e) Routine fabrication, maintenance, and repair of buildings, structures, equipment, or vehicles at the source where air emissions from these activities would not be associated with any commercial production process, including; brazing, soldering, or welding operations and associated equipment:

(1) One (1) MIG, One (1) TIG, One (1) Arc, and One (1) Oxyacetylene welding units located in the maintenance department. [326 IAC 6-3-2]

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F149-23029-00011, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement,

any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61 - 53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain

and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or

facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61 - 53 IGCN 1003
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent

injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F149-23029-00011 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61 - 53 IGCN 1003
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of

planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40) The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61 - 53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61 - 53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61 - 53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring

compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61 - 53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit of Volatile Organic Compounds (VOCs) and PM_{10} from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period, each;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Stack Height [326 IAC -7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61 - 52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61 - 53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61 - 53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan[326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61 - 53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) wood preservative dip tank, constructed in 1995, with a maximum throughput of 1600 units per hour, using baffles and dry filters for control;

(b) One (1) primer spray line, constructed in 1995, with a maximum throughput of 1600 units per hour, using baffles and dry filters for control;

(c) One (1) stain/clearcoat spray line, constructed in 1995, with a maximum throughput of 1600 units per hour, using baffles and dry filters for control;

(d) Sealants, sealers, caulks,and adhesives used during the manufacturing process.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8] [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 2-8 (FESOP), this facility shall use less than 98.78 tons of VOC, including coating, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 100 tons per (12) consecutive month period. Compliance with this limit makes 326 IAC 2-7 (Part 70) not applicable.

(b) Pursuant to Construction permit 149-4318-00011 issued on October 2, 1995 and 326 IAC 8-1-6, the BACT will continue to be the following;

(1) The use of a dip tank in the application of wood preservative;

(2) The use of water based coatings for the primer paint line;

(3) The use of water based stains and clear coat for the stain/clear coat;

(4) The use of airless spray guns for primer and stain/clear coat;

(5) The use of water and detergent for clean-up on primer and stain/clear coat lines.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), the particulate from the primer spray line, and stain/clearcoat spray shall be controlled by baffles and dry filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.5 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.1.6 Monitoring

(a) To document compliance with Condition D.1.3, observation shall be made daily to verify the placement, integrity and particule loading of filters, weekly observations shall be made of the overspray from the wood preservative dip tank, primer spray line, stain/clearcoat spray line and the use of sealers, sealants, caulks, and adhesive while one or more of the surface coating operations are in operation. Section C – Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) Monthly inspection shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground, weather permitting. If a noticeable change in overspray emission, or evidence of overspray emission is observed at any stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.7 Record Keeping Requirement

(a) To document compliance with Condition D.1.1(a), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount of VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

(c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 (a) shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1)

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(e) One (1) woodworking operation, constructed in 1995, with a processing weight rate of 1,317 pounds per hour, controlled by a baghouse, and exhausting to Stack D.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emissions Limitations for Manufacturing Processes), the allowable PM emission rate from the woodworking facilities shall not exceed 3.1 pounds per hour when operating at a process weight rate of 1,317 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ Where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 PM_{10} [326 IAC 2-8] [326 IAC 2-2]

Pursuant to 326 IAC 2-8 (FESOP), the amount of PM_{10} emitted from the woodworking operations shall be limited to 3.1 pounds per hour.

Compliance with this limit is necessary to limit emissions of PM_{10} from the entire source to less than 100 tons per twelve (12) consecutive month period, and therefore render 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

(a) In order to comply with Conditions D.2.1 and D.2.2, the baghouse for PM and PM_{10} control shall be operational and control emissions from the woodworking operation at all times that the woodworking operations are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notifications shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.5 Visible Emissions Notations

(a) Daily visible emissions notations of the woodworking stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eight percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation. For sources capable of redirecting vents, a baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Report Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).

(b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] Insignificant Activities

(b) Natural gas-fired combustion sources with heat input equal to or less than ten million Btu/hr:

(1) One (1) natural gas-fired aerator heater, identified as H-7, with a maximum heat input capacity of 1.2 MMBtu/hr: [326 IAC 6-2-4]

(2) Four (4) natural gas-fired roof mounted heaters, identified as H-1 through H-4, with a maximum heat input capacity of 0.150 MMBtu/hr; [326 IAC 6-2-4]

(3) One (1) natural gas-fired roof mounted heater with no identification, installed but not in operation, with a maximum heat input capacity of 0.150 MMBtu/hr; [326 IAC 6-2-4]

(4) Two (2) natural gas-fired aerator heaters, identified as H-5 and H-6, each with a maximum heat input capacity of 3.0 MMBtu/hr; [326 IAC 6-2-4]

(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three-hundredths (0.03) grain per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute; [326 IAC 6-3-2]

(d) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months; [326 IAC 8-3-2] [326 IAC 8-3-5]

(e) Routine fabrication, maintenance, and repair of buildings, structures, equipment, or vehicles at the source where air emissions from these activities would not be associated with any commercial production process, including; brazing, soldering, or welding operations and associated equipment:

(1) One (1) MIG, One (1) TIG, One (1) Arc and One (1) Oxyacetylene welding units located in the maintenance department. [326 IAC 6-3-2]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.3.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), for indirect heating units constructed after September 1, 1983 and having a total source input capacity less than 10 million British thermal units per hour, the PM emissions shall not exceed 0.6 pounds per million British thermal unit. Therefore, the PM from the eight (8) natural gas-fired heaters, (H-1 through H-7, operational and one (1) with no unit identification and not in operation), is limited to 0.6 pound per million British thermal units total.

D.3.2 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2(e), the particulate matter from the grinding and machining operation shall not exceed 0.551 pound per hour when operating at a process weight rate of less than 100 pounds per hour. When operating at a process weight rate of 100 pounds per hour or more, the particulate matter shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour.

(b) Pursuant to 326 IAC 6-3-2(e), the particulate matter from the brazing, soldering and welding operation shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour. When operating at a process weight rate of 100 pounds per hour or more, the particulate matter shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour.

D.3.3 Volatile Organic Compound (VOC) [326 IAC 8-3-2]

Pursurant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(1) Equip the cleaner with a cover;

(2) Equip the cleaner with a facility for draining cleaned parts;

(3) Close the degreaser cover whenever parts are not being handled in the cleaner;

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases:

(5) Provide a permanent, conspicuous label summarizing the operation requirements;

(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D 3.4 Volatile Organic Compound (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaner degreaser shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38° C) (one hundred degrees Fahrenheit (100° F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32)

millimeters of mercury of six-tenths (0.6) pounds per square inch) measured at thirty eight degrees Celsius (38˚ C) (one hundred degrees Fahrenheit (100˚ F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, consipicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty eight degrees Celsius (38˚ C) (one hundred degrees Fahrenheit (100˚ F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9˚ C) (one hundred twenty degrees Fahrenheit (120˚ F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) Other systems demonstrated equivalent control such as a refrigerated chiller of carbon absorption. Such systems shall be submitted to the US EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Barber and Ross Company
Source Address: 1001 W. Culver Road, Knox, Indiana 46534
Mailing Address: 1001 W. Culver Road, Knox, Indiana 46534
FESOP Permit No.: F149-23029-00011

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61 - 53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Barber and Ross Company
Source Address: 1001 W. Culver Road, Knox, Indiana 46534
Mailing Address: 1001 W. Culver Road, Knox, Indiana 46534
FESOP Permit No.: F149-23029-00011

This form consists of 2 pages **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Barber and Ross Company
Source Address: 1001 W. Culver Road, Knox, Indiana 46534
Mailing Address: 1001 W. Culver Road, Knox, Indiana 46534
FESOP Permit No.: F149-23029-00011
Facility: Dip tank, primer spray line, and stain/clearcoat sprayline
Parameter: VOC
Limit: less than 98.78 tons per twelve (12) consecutive months

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC usage for this Month	VOC usage for previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Barber and Ross Company
Source Address: 1001 W. Culver Road, Knox, Indiana 46534
Mailing Address: 1001 W. Culver Road, Knox, Indiana 46534
FESOP Permit No.: F149-23029-00011

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked No deviations occurred this reporting period.

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name:	Barber and Ross Company
Source Location:	1001 W. Culver Road, Knox, Indiana 46534
County:	Stark
SIC Code:	2431, 2499
Permit Number:	F149-23029-00011
Permit Reviewer:	Marcia Earl

On May 17, 2007, the Office of Air Quality (OAQ) had a notice published in the Knox Leader and Review, Knox, Indiana, stating that Barber and Ross Company had applied for a Federally Enforceable State Operating Permit (FESOP) renewal for a stationary wood window manufacturing and surface coating operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments on the proposed FESOP renewal were received on May 22, 2007 from John W. Kilmer of BCA Consultants, Inc.

Comment

The facility has modified its materials since the issuance of the previous FESOP in 2002 to reduce the hazardous air pollutant (HAP) content. As a result, the potential to emit (PTE) single and total HAPs are below the major source thresholds (10 tpy for single HAP and 25 tpy for total HAP). The PTE calculations, verified in the Draft Permit TSD, indicate that the facility is minor for HAPs and is not subject to NESHAP. Continued compliance with the 10/25 TPY HAP limits is inherent in the facility and the materials in use. Therefore it should not be necessary to demonstrate compliance monthly/quarterly with limits which the facility does not have the capacity to exceed. Compliance may be demonstrated by maintaining usage and formulation data documenting HAP content supplied by the manufacturer. Such data confirm that the facility has not exceeded the limits in permit Section D.1.2 (HAPs) but should not require reporting (beyond the compliance certification).

Response

With the modification of materials since the issuance of the previous FESOP and the Hazardous Air Pollutants (HAPs) being below the major source thresholds, monthly and/or quarterly reporting is not necessary. The table below reflects the hazardous air pollutants at the source. For detailed calculations see Appendix A. The table of Contents has been updated to match the conditions in Section D.1.

Toluene	MIBK	Ammonia	Glycol Ethers	Methanol	Combustion Sources	Total HAPs
1.22	0.03	1.31	5.51	0.10	0.0660	8.236

No changes have been made to the TSD because OAQ refers that the Technical Support Document reflects the permit that was on public notice. Changes that occur after public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result, ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Changes to the permit are noted as follows: stricken language has been deleted; **bold** language has been added.

~~D.1.2 Hazardous Air Pollutants [326 IAC 2-8]~~

~~Pursuant to 326 IAC 2-8-4, the hazardous air pollutant emissions shall be limited as follows:~~

~~(a) The amount of any single HAP delivered to the applicator plus the amount of any single HAP used for clean-up shall be less than 10 tons per twelve (12) consecutive month period.~~

~~(b) The amount of any combination of HAPs delivered to the applicator plus the amount of any combination of HAPs used for clean-up shall be less than 25 tons per twelve (12) consecutive month period.~~

D.1.~~3~~**2** Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), the particulate from the primer spray line, and stain/clearcoat spray shall be controlled by baffles and dry filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.1.~~4~~**3** Preventive Maintenance Plan [326 IAC2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

D.1.~~5~~**4** Volatile Organic Compounds (VOC) ~~and Hazardous Air Pollutants (HAP)~~

Compliance with the VOC ~~and HAP~~ content and usage limitations contained in conditions D.1.1 ~~and D.1.2~~ shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.~~6~~**5** VOC ~~and HAP~~ Emissions

Compliance with Condition D.1.1 ~~and D.1.2~~ shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage ~~and single HAP and total HAP usage~~ for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.~~7~~**6** Monitoring

(a) To document compliance with Condition D.1.2, observation shall be made daily to verify the placement, integrity and particle loading of filters, weekly observations shall be made of the overspray from the wood preservative dip tank, primer spray line, stain/clearcoat spray line and the use of sealers, sealants, caulks, and adhesive while one or more of the surface coating operations are in operation. Section C - Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) Monthly inspection shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground, weather permitting. If a noticeable change in overspray emission, or evidence of overspray emission is observed at any stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.~~8~~**7** Record Keeping Requirement

(a) To document compliance with Conditions D.1.1(a) ~~and D.1.2~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC ~~and HAP~~ usage limits and /or the VOC ~~and HAP~~ emission limits established in Condition D.1.1 ~~and D.1.2~~.

(1) The amount of VOC ~~and HAP~~ content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC ~~and HAP~~ content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC ~~and HAP~~ usage for each month; and

(6) The weight of VOCs ~~and HAPs~~ emitted for each compliance period.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.~~9~~**8** Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(a) ~~and D.1.2~~ shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1)

~~INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT~~
~~OFFICE OF AIR QUALITY~~
~~COMPLIANCE DATA SECTION~~

~~FESOP Quarterly Report~~

Source Name: Barber and Ross Company
Source Address: 1001 W. Culver Road, Knox, Indiana 46534
Mailing Address: 1001 W. Culver Road, Knox, Indiana 46534
FESOP Permit No.: F149-23029-00011
Facility: Dip tank, primer spray line, and stain/clearcoat sprayline
Parameter: Single HAP
Limit: less than 10 tons per twelve (12) consecutive months

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC usage for this Month	VOC usage for previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

□ No deviation occurred in this quarter.

□ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Barber and Ross Company
Source Address: 1001 W. Culver Road, Knox, Indiana 46534
Mailing Address: 1001 W. Culver Road, Knox, Indiana 46534
FESOP Permit No.: F149-23029-00011
Facility: Dip tank, primer spray line, and stain/clearcoat sprayline

~~Parameter: Combination of HAPs~~
~~Limit: less than 25 tons per twelve (12) consecutive months~~

~~YEAR:_____~~

~~Month~~	~~Column 1~~	~~Column 2~~	~~Column 1 + Column 2~~
	~~VOC usage for this Month~~	~~VOC usage for previous 11 Months~~	~~12 Month Total~~
~~Month 1~~			
~~Month 2~~			
~~Month 3~~			

~~□ No deviation occurred in this quarter.~~

~~□ Deviation/s occurred in this quarter.~~
~~Deviation has been reported on:_____~~

~~Submitted by:~~ _____
~~Title / Position:~~ _____
~~Signature:~~ _____
~~Date:~~ _____
~~Phone:~~ _____

~~Attach a signed certification to complete this report.~~

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Barber & Ross Company
Source Location:	1001 W. Culver Road, Knox, IN 46534
County:	Starke
SIC Code:	2431, 2499
Operation Permit No.:	F149-14610-00011
Operation Permit Issuance Date:	February 5, 2002
Permit Renewal No.:	F149-23029-00011
Permit Reviewer:	MLE

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Barber & Ross Company relating to the operation of a stationary wood window manufacturing and surface coating operation.

History

On May 8, 2006, Barber & Ross Company submitted applications to the OAQ requesting to renew their operating permit. Barber & Ross Company was issued a Federally Enforceable State Operating Permit on February 5, 2002.

Permitted Emission Units and Pollution Control Equipment

(a) One (1) wood preservative dip tank, constructed in 1995, with a maximum throughput of 1600 units per hour, using baffles and dry filters for control;

(b) One (1) primer spray line, constructed in 1995, with a maximum throughput of 1600 units per hour, using baffles and dry filters for control;

(c) One (1) stain/clearcoat spray line, constructed in 1995, with a maximum throughput of 1600 units per hour, using baffles and dry filters for control;

(d) Sealants, sealers, caulks, and adhesives used during the manufacturing process;

(e) One (1) woodworking operation, constructed in 1995, with a processing weight rate of 1,317 pounds per hour, controlled by a baghouse and exhausting to Stack D.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4]

(b) Natural gas-fired combustion sources with heat input equal to or less than ten million Btu/hr:

(1) One (1) natural gas-fired aerator heater, identified as H-7, with a maximum heat input capacity of 1.2 MMBtu/hr; [326 IAC 6-2-4]

(2) Four (4) natural gas-fired roof mounted heaters, identified as H-1 through H-4, with a maximum heat input capacity of 0.150 MMBtu/hr; [326 IAC 6-2-4]

(3) One (1) natural gas-fired roof mounted heater with no identification, installed but not in operation, with a maximum heat input capacity of 0.150 MMBtu/hr; [326 IAC 6-2-4]

(4) Two (2) natural gas-fired aerator heaters, identified as H-5 and H-6, each with a maximum heat input capacity of 3.0 MMBtu/hr. [326 IAC 6-2-4]

(c) Replacement of repair electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(d) Emission units with PM and PM_{10} emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year: one (1) storage tank, with a maximum capacity of 10,000 gallons, storing minerals spirits;

(e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three-hundredths (0.03) grain per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute; [326 IAC 6-3-2]

(f) Woodworking, aluminum and vinyl grinding, trimming and cutting controlled by dust collectors:

(1) C1030 Rees Dust Collector, 10 hp motor, 2809 cfm

(2) Model 820 Reliant Dust Collector, 2 hp motor, 1150 cfm

(3) Penn State Industrial DC-2 Dust Collector, 1.5 hp motor, 1500 cfm

(4) C1030 Rees Dust Collector, 10 hp motor, 2809 cfm

(g) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months; [326 IAC 8-3-2] [326 IAC 8-3-5]

(h) Routine fabrication, maintenance, and repair of buildings, structures, equipment, or vehicles at the source where air emissions from those activities would not be associated with any commercial production process, including; brazing, soldering or welding operations and associated equipment;

(1) One (1) MIG, One (1) TIG, One (1) Arc, and One (1) Oxyacetylene welding units located in the maintenance department. [326 IAC 6-3-2]

Existing Approvals

The source has been operating under the previous FESOP 149-14610-00011 issued on February 5, 2002, with an expiration date of February 5, 2007, and the following amendments and revisions:

(a) Administrative Amendment 149-17356-00011 issued on July 2, 2003

(b) FESOP Renewal 149-14610-00011 issued on October 2, 1995

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A, pages 1 through 7 of this document for detailed emission calculations.

County Attainment Status

The source is located in Starke County.

Pollutant	Status
$PM_{2.5}$	Attainment
PM_{10}	Attainment
SO_2	Attainment
NOx	Attainment
8 hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Starke County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Starke County has been classified as attainment or unclassifiable for PM_{10}, SO_2, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Starke County has been classified as unclassifiable or attainment for $PM_{2.5}$. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for $PM_{2.5}$ emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for $PM_{2.5}$ emissions, it has directed states to regulate PM_{10} emissions as surrogate for $PM_{2.5}$ emissions.

(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 and revoking the one-hour ozone standard in Indiana.

(e) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compounds (VOC) emissions are not counted toward PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	4507.78
PM_{10}	4507.78
SO_2	0.00
VOC	207.18
CO	2.90
NO_x	3.50

HAPs	Unrestricted Potential Emissions (tons/yr)
Toluene	1.22
MIBK	0.03
Ammonia	1.31
Glycol Ethers	5.51
Methanol	0.10
Benzene	negligible
Dichlorobenzene	negligible
Formaldehyde	0.0026
Hexane	0.063
Lead	negligible
Cadmium	negligible
Chromium	negligible
Nickel	negligible
Manganese	negligible
Total	8.24

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and PM_{10} are equal to or greater than 250 tons and 100 tons per year respectively. Therefore, the source is subject to the provisions of 326 IAC 2-7. This source will be issued a FESOP because the source will limit its PM_{10} emissions below Title V levels.

(b) The potential to emit (as defined in 326 IAC 2-7-2(29) of volatile organic compounds are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. This source will be issued a FESOP because the source will limit its VOC emissions to below Title V levels.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

(d) Fugitive Emissions
Pursuant to 326 IAC 2-7-2(e) all fugitive emissions are included in determining the applicability of Part 70.

Acutal Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM_{10}	Not Reported
SO_2	Not Reported
VOC	45
CO	Not Reported
NOx	Not Reported
HAP	Not Reported

Potential to Emit After Issuance

This source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission unit. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential To Emit (tons/year)						
Process/emission unit	PM	PM_{10}	SO_2	VOC	CO	NOx	HAPS
Surface Coating	2.54	2.54	0.00	< 98.55	0.00	0.00	less than 10 tons per year of single HAP
Degreasing	0.00	0.00	0.00	0.23	0.00	0.00	0.00
Woodworking	4.50	4.50	0.00	0.00	0.00	0.00	0.00
Combustion Sources	0.10	0.30	0.00	0.20	2.9	3.5	0.066
Total Emissions	less than 250	less than 100	less than 100	less than 100	less than 100	less than 100	less than 25 tons per year total HAPs

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.

(b) 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial Institutional Steam Generating Units), which is incorporated by reference 326 IAC 12, does not apply to this source because the insignificant activity natural gas-fired combustion sources have input rates less than 10 MMBtu per hour.

(c) 40 CFR 63, Subpart JJ (Wood Furniture Manufacturing Operations), which is incorporated by reference 326 IAC 20, is not included in this permit. This source is not considered a wood furniture manufacturing source. It manufactures wood windows.

(d) 40 CFR 63, Subpart QQQQ (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products), which is incorporated by reference 326 IAC 20, is not included in this permit. This source is not a major source of Hazardous Air Pollutants (HAPs).

(e) 40 CFR 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters), which is incorporated by reference 326 IAC 20, is not included in this permit. This source is not a major source of Hazardous Air Pollutants (HAPs).

(f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 40 CFR Part 61, 326 IAC 20 and 40 CFR Part 63) included in this permit.

(g) This source is a FESOP source and is not a major Part 70 source. Therefore, the requirements of 40 CFR Part 64 (Compliance Assurance Monitoring), are not included in this permit.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This stationary source is not a major source for PSD purposes because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and is not one of the 28 listed source categories.

326 IAC 2-6 (Emission Reporting)

This source is located in Starke County and it is not required to operate under a Part 70 permit, because the Permittee has taken limits below Title V levels and subject to 326 IAC 2-8 (FESOP). Therefore, 326 IAC 2-6 is not included in this permit.

326 IAC 2-8 (FESOP)

(a) This facility shall use less than 98.78 tons of VOC, including coatings, dilution solvents, cleaning solvents, and degreasing operation per twelve (12) consecutive month period. The VOC usage limit is required to limit the potential to emit of VOC from the source to less than 100 tons per twelve (12) consecutive month period. Compliance with this limit renders 326 IAC 2-7 (Part 70) not applicable.

(b) The amount of any single HAP used in the dip tanks and delivered to the applicators plus the amount of any single HAP used for clean-up shall be limited to less than ten (10) tons per twelve (12) consecutive month period.

The amount of any combination of HAPs used in the dip tanks and delivered to the applicators plus the amount of any combination of HAPs used for clean-up shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with these limits renders the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-4.1 (Major Sources of HAP) not applicable.

(c) Pursuant to 326 IAC 2-8 (FESOP), the amount of PM_{10} emitted from the woodworking operations is limited to 3.1 pounds per hour. Therefore, compliance with this limit for woodworking, limits emissions of PM_{10} from the entire source to less than 100 tons per year, making 326 IAC 2-7 not applicable.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2(2) (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

State Rule Applicability – Surface Coating

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes) the particulate from the surface coating process shall be controlled by using baffles and dry filters. The Permittee shall operate the control devices in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities)

The painting operations at this source are subject to 326 IAC 8-1-6. Pursuant to Construction permit CP149-4318-00011 issued October 2, 1995, the BACT will continue to be as follows:

(a) The use of a dip tank in the application of wood preservative;

(b) The use of water based coatings for the primer paint line;

(c) The use of water based stains and clear coat for the stain/clear coat;

(d) The use of airless spray guns for the primer and stain/clear coat;

(e) The use of water and detergent for clean-up primer and stain/clear coat lines.

326 IAC 8-2-10 (Flat Wood Panel Manufacturing Operations)

326 IAC 8-2-10 (Flat Wood Panel Manufacturing Operations) is not applicable to this source, because this rule applies to sources constructing wood panels. This source constructs wood windows.

326 IAC 8-2-11 (Wood Furniture Coating)

326 IAC 8-2-11 (Wood Furniture Coating) is not applicable to this source, because this rule pertains to wood furniture coating in Lake, Porter, Clark or Floyd Counties. This source is in Starke County and manufactures wood windows.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) is not applicable to this source, because this rule pertains to coating wood furniture or cabinets and this source coats wood windows.

State Rule Applicability – Woodworking Facilities

326 IAC 6-3-2 (Particulate Emissions for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes) the allowable particulate emission rate from the woodworking facility shall not exceed 3.10 pounds per hour when operating at a process weight rate of 1,317 pounds per hour.

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

State Rule Applicability – Insignificant Activities

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The eight (8) natural gas-fired heaters, H-1 through H-7 operational and one (1) roof mounted heater with no unit identification and not operational), all constructed after September 21, 1983, must comply with the requirements of 326 IAC 6-2-4. The emission limitations are based on the following equation given in 326 IAC 6-2-4

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The heat input capacity of the natural gas-fired aerator heaters (H-1 through H-7 and one (1) roof mounted heater with no identification) is 7.95 MMBtu/hr total.

$Pt = 1.09/(7.95)^{0.26} = 0.64$ lb/MMBtu heat input.

Pursuant to 326 IAC 6-2-4(a), for Q less than ten (10) MMBtu/hr, Pt shall not exceed 0.6. Therefore, the particulate matter emission from the natural gas-fired heaters (H-1 through H-7 and one (1) roof mounted heater with no identification) is limited to 0.6 pound per MMBtu heat input total.

326 IAC 6-3-2 (Particulate Emissions for Manufacturing Processes)

(a) Pursuant to 326 IAC 6-3-2(e), the particulate matter from the grinding and machining operation shall not exceed 0.551 pound per hour when operating at a process weight rate of less than 100 pounds per hour. When operating at a process weight rate of 100 pounds per hour or more, the particulate matter shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3-2(e), the particulate matter from the brazing, soldering and welding operation shall not exceed 0.551 pound per hour when operating at a process weight rate of less than 100 pounds per hour. When operating at a process weight rate of

100 pounds per hour or more, the particulate matter shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Pursurant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(1) Equip the cleaner with a cover;

(2) Equip the cleaner with a facility for draining cleaned parts;

(3) Close the degreaser cover whenever parts are not being handled in the cleaner;

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label summarizing the operation requirements;

(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaner degreaser shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38˚ C) (one hundred degrees Fahrenheit (100˚ F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury of six-tenths (0.6) pounds per square inch) measured at thirty eight degrees Celsius (38˚ C) (one hundred degrees Fahrenheit (100˚ F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, consipicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty eight degrees Celsius (38° C) (one hundred degrees Fahrenheit (100° F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9° C) (one hundred twenty degrees Fahrenheit (120° F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) Other systems demonstrated equivalent control such as a refrigerated chiller of carbon absorption. Such systems shall be submitted to the U. S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The potential to emit VOC is limited to less than 100 tons per year, this source was constructed after January 1, 1980 and is not located in Lake or Marion County. Therefore, the requirements of 326 IAC 8-6 are not applicable.

Testing Requirements

Testing is not required for this source. PM and PM_{10} are the major pollutants and emitted primarily from the woodworking operation that is controlled by a baghouse.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance

Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The surface coating operations have applicable compliance conditions as specified below:

   (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the baffles and dry filters, weekly observations shall be made of the overspray from the wood preservative dip tank, primer spray line, stain/clearcoat spray line and the use of sealers, sealants, caulks, and adhesive while one or more of the surface coating operations are in operation. If a condition exists which should result in a response step the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

   (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedance, shall be considered a deviation from the permit.

   These monitoring conditions are necessary because the baffles and dry filters for the primer spray line and stain/clearcoat spray line, must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Process) and 326 IAC 2-8 (FESOP).

(2) The woodworking operation has applicable compliance monitoring conditions as specified below:

   (a) The Permittee shall maintain a daily record of visible emission notations of the woodworking stack exhausts. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously normal means these conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during the part of the operations that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

   (b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation. For sources capable of redirecting vents, a baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

(c) Broken or Failed Bag Detection

(1) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

(2) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infilteration, leaks, dust traces or triboflows.

These monitoring conditions are necessary because the baghouse for the woodworking operations must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

Recommendation

The staff recommends to the Commissioner that the FESOP renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP renewal application for the purposes of this review was received on April 27, 2006.

Conclusion

The operation of this wood window manufacturing and surface coating operation shall be subject to the conditions of the **FESOP 149-23029-00011**.

Appendix A: Emission Summary

Company Name: Barber & Ross Company
Address City IN Zip: 1001 W. Culver Road, Knox, IN 46534
Permit Number F149-23029-00011
Reviewer: Marcia Earl
Date: August 21, 2006

Uncontrolled Emissions

Emission Units	PM	PM_{10}	SO_2	NO_X	VOC	CO	HAPs
Surface Coating	2.54	2.54	0.00	0.00	206.75	0.00	8.17
Degreasing Operation	0.00	0.00	0.00	0.00	0.23	0.00	0.00
Woodworking Operation	4505.14	4504.14	0.00	0.00	0.00	0.00	0.00
Combustion Sources	0.10	0.30	0.00	3.50	0.20	2.90	0.0660
Totals	4507.78	4507.98	0.00	3.50	207.18	2.90	8.236

Controlled Emissions

Emission Units	PM	PM_{10}	SO_2	NO_X	VOC	CO	HAPs
Surface Coating	2.54	2.54	0.00	0.00	<98.55	0.00	less than 10 tons per single HAP
Degreasing Operation	0.00	0.00	0.00	0.00	0.23	0.00	
Woodworking Operation	4.50	4.50	0.00	0.00	0.00	0.00	
Combustion Sources	0.10	0.30	0.00	3.40	0.20	2.90	less than 25 tons total HAPs
Totals	7.14	7.34	0.00	3.40	< 100	2.90	

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Barber & Ross Company
Address City IN Zip: 1001 W. Culver Road, Knox, IN 46534
Permit Number: F149-23029-00011
Reviewer: Marcia Earl
Date: August 21, 2006

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
SEALANTS																
Acrylic Seam Sealer	8.26	42.00%	0.0%	42.0%	0.0%	unknown	0.00005	1600.000	3.47	3.47	0.28	6.66	1.22	0.00	unknown	100%
Poly-Glaze Plus	8.51	5.00%	0.0%	0.30%	4.7%	unknown	0.00013	1600.000	0.03	0.03	0.01	0.13	0.02	0.00	unknown	100%
SM Polyglaze	8.67	5.00%	0.0%	5.0%	0.0%	unknown	0.00001	1600.000	0.43	0.43	0.01	0.17	0.03	0.00	unknown	100%
SM8200 Clear	8.84	42.00%	0.0%	4.91%	39.4%	unknown	0.00025	1600.000	0.72	0.43	0.17	4.17	0.76	0.00	unknown	100%
SM8400 Acrylethane	9.01	47.00%	0.0%	4.4%	46.0%	unknown	0.00001	1600.000	0.74	0.40	0.01	0.15	0.03	0.00	unknown	100%
SM8500 Clear	8.84	42.00%	0.0%	4.9%	39.4%	unknown	0.00028	1600.000	0.72	0.43	0.19	4.67	0.85	0.00	unknown	100%
Boss GS1 Silicone Gl Sealeant	10.09	0.00%	0.0%	0.0%	0.0%	100.00%	0.00071	1600.000	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100%
Dura Seal	9.67	0.00%	0.0%	0.0%	0.0%	100.00%	0.00001	1600.000	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100%
DIP TANK																
Woodlife F Clear	6.60	97.58%	0.0%	97.6%	0.0%	unknown	0.00410	1600.000	6.44	6.44	42.25	1013.96	185.05	0.00	unknown	100%
O-Aromatic Mineral Spirits	6.51	100.00%	0.0%	100.0%	0.0%	0.00%	0.00013	1600.000	6.51	6.51	1.35	32.50	5.93	0.00	0.00	100%
PRIMER LINE																
Super Aqua-Zen Millwork Primer	12.41	40.52%	0.0%	2.8%	56.2%	unknown	0.00102	1600.000	0.80	0.35	0.57	13.76	2.51	0.00	unknown	100%
B&R White Semi-Gloss Awua-Zen topcoat	10.57	49.07%	0.0%	8.3%	51.8%	unknown	0.00102	1600.000	1.81	0.88	1.43	34.28	6.26	0.00	100.00	100%
STAIN/CLEAR COAT LINE																
Aqua-Cote Clear Top Coats	8.79	70.00%	0.0%	9.5%	63.9%	unknown	0.00025	1600.000	2.30	0.83	0.33	7.97	1.46	1.16	unknown	75%
Aqua-tone Water-based stain	8.42	97.00%	0.0%	0.3%	97.8%	29.80%	0.00025	1600.000	1.05	0.02	0.01	0.23	0.04	0.11	0.00	75%
CLEAN-UP																
Ethanol	7.38	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	1600.000	7.38	7.38	0.59	14.17	2.59	1.27	0.00	100%
Totals											47.20	1132.82	206.75	2.54		

State Potential Emissions **Add worst case coating to all solvents**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
Natural gas-fired combustion sources

Company Name: **Barber and Ross Company**
Address City IN Zip: **1001 West Culver Road, Knox, IN 46534**
Permit Number: **F149-23029-00011**
Reviewer: **Marcia Earl**
Date: **August 21, 2006**

Unit	Capacity
H-1	0.150
H-2	0.150
H-3	0.150
H-4	0.150
H-5	3.000
H-6	3.000
H-7	1.200
Unidentified	0.150
Total	**7.95**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
7.95	69.6

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.3	0.0	3.5	0.2	2.9

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
Natural gas-fired combustion sources
HAPs Emissions

Company Name: **Barber and Ross Company**
Address City IN Zip: **1001 West Culver Road, Knox, IN 46534**
Permit Number: **F149-23029-00011**
Reviewer: **Marcia Earl**
Date: **August 21, 2006**

Heat Input Capacity
MMBtu/hr
7.95

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	7.312E-05	4.179E-05	2.612E-03	6.268E-02	1.184E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.741E-05	3.830E-05	4.875E-05	1.323E-05	7.312E-05

Methodology

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Company Name: Barber & Ross Company
Address City IN Zip: 1001 W. Culver Road, Knox, IN 46534
Permit No: F149-23029-00011
Reviewer: Marcia Earl
Date: February 2007

Uncontrolled

Material	Usage (gal) (per year)	VOC (lbs/gal)	VOC (lbs/year)	VOC (tons/year)	HAPs (tons/year)
Degreasing	68.00	6.70	456	0.23	0.00

Methodology

Usage * Weight = lbs/year * ton/2000lbs = 0.23 tons per year of VOC's

Emission factors were obtained from the Material Safety Data Sheet

Appendix A: Emission Calculations
HAP Emission Calculations
From Surface Coating Operation

Company Name: **Barber and Ross Company**
Address City IN Zip: **1001 West Culver Road, Knox, IN 46534**
Permit Number: **F149-23029-00011**
Permit Reviewer: **Marcia Earl**
Date: **August 21, 2006**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % MIBK	Weight % Ammonia	Weight % Glycol Ethers	Weight % Methanol	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Ammonia Emmisions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total Emissions (ton/yr)
SEALANTS														
Acrylic Seam Sealer	8.26	0.00005	1600.00	42.00%	0.00%	0.00%	0.00%	0.00%	1.22	0.00	0.00	0.00	0.00	1.22
Poly-Glaze Plus	8.51	0.00013	1600.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
SM Polyglaze	8.67	0.00001	1600.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
SM8200 Clear	8.84	0.00025	1600.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
SM8400 Acrylethane	9.01	0.00001	1600.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
SM8500 Clear	8.84	0.00028	1600.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Boss GS1 Silicone Gl Seal	10.09	0.00071	1600.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
DuraSeal	9.67	0.00001	1600.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
DIP TANK														
Woodlife F Clear	6.6	0.00410	1600.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
O-Aromatic Mineral Spirits	6.51	0.00013	1600.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
PRIMER LINE														
Super Aqua-Zen Millwork P	12.41	0.00102	1600.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
B&R White Semi-Glass AZ T	10.57	0.00102	1600.00	0.00%	0.00%	1.74%	6.27%	0.00%	0.00	0.00	1.31	4.74	0.00	6.05
STAIN/CLEAR COAT LINE														
Aqua-Cote Clear Top Coats	8.79	0.00025	1600.00	0.00%	0.00%	0.00%	5.00%	0.00%	0.00	0.00	0.00	0.77	0.00	0.77
Aquaptone WB Stain	8.42	0.00025	1600.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
CLEAN-UP														
Ethanol	7.38	0.00005`	1600.00	0.00%	1.00%	0.00%	0.00%	4.00%	0.00	0.03	0.00	0.00	0.10	0.13
Total State Potential Emissions									**1.22**	**0.03**	**1.31**	**5.51**	**0.10**	**8.17**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
Woodworking Operations

Company Name: Barber and Ross Company
Address City IN Zip: 1001 West Culver Road, Knox, IN 4653
Permit Number: F149-23029-00011
Permit Reviewer: Marcia Earl
Date: August 21, 2006

Gas Flow Rate = 40,000 acfm
Outlet grain loading = 0.003 gr/acf
Control Efficiency = 99.9%

	Air Flow Rate (acfm)	Outlet Grain Loating (gr/acf)	Control Efficiency (%)	PM/PM_{10} Uncontrolled Emissions (lbs/hr)	PM/PM_{10} Uncontrolled Emissions (tons/yr)	PM/PM_{10} Controlled Emissions (lbs/hr)	PM/PM_{10} Controlled Emissions (tons/yr)
Woodworking Operation	40,000	0.003	99.90%	1.029	4505.14	1.029	4.50

Methodology

(gr/ascf) x (acfm) x (60 min/hr) / (7000 gr/lb) = lbs/hr
(lbs/hr) x (8760 hr/yr) / (ton/2000 lbs = tons/yr annual controlled emissions

(lbs/hr) / (1-0.999) = lbs/hr
(lbs/hr) x (8760 hrs/hr) / (tons/2000 lbs) = tons/yr annual uncontrolled emissions